

Message

From: Fennessy, Christopher [christopher.fennessy@Rocket.com]
Sent: 12/19/2017 6:20:25 PM
To: Keller, Lynn [Keller.Lynn@epa.gov]; ROJAS-MICKELSON, DAEWON [rojas-mickelson.daewon@epa.gov]; jim.rohrer@dtsc.ca.gov; MacNicholl, Peter@DTSC (Peter.MacNicholl@dtsc.ca.gov) (Peter.MacNicholl@dtsc.ca.gov) [Peter.MacNicholl@dtsc.ca.gov]; MacDonald, Alex@Waterboards (Alex.MacDonald@waterboards.ca.gov) [Alex.MacDonald@waterboards.ca.gov]
CC: Kvam, Peter [peter.kvam@Rocket.com]
Subject: RE: Draft 2017 PPMR Update
Attachments: PPMR-2017 RLSO.doc

Hi Everyone – Attached is the updated PPMR based upon your comments to the draft version submitted on October 25. Comments were received from DTSC and RWQCB. If you have time to review the attached and confirm that I incorporated your comments correctly, please do so and let me know by 3pm this Thursday, December 21. The final PPMR 2017 Update will be sent on Thursday evening or Friday morning. Thanks, Chris

Specific responses to comments are as follows:

DTSC Comments

- ERA Group corrected a reference. The reference to Section 1.0 in Section 4.2.1 was changed to accurately reference Section 4.0
- HHRA Group requested updates to the list of overarching guidance documents listed in Section 4.1. The out of date reference was replaced with references to Note 1 and Note 3.
- There is still an outstanding request from DTSC to transfer RCRA J (Forced Draft) to CERCLA for final investigation and cleanup. DTSC and AR are discussing the process. For now, RCRA J is still referenced as being part of RCRA. When a decision is made, I will include the decision in the subsequent PPMR annual update.

RWQCB Comments

- Alex edited the text referring to Area 40 and the creation of OU 10. Most of these edits were accepted verbatim. The text in the Executive Summary and Section 3 were revised to:

On October 28, 2014, Aerojet sent a letter to the USEPA requesting that a new Operable Unit (OU) 10 be created at the site for Area 40. The City of Folsom also sent USEPA a letter on July 16, 2015 about Area 40 and its ties to the City's redevelopment plans as a utility corridor, open space, and a park area. In this letter, the City of Folsom requested that USEPA expedite regulatory reviews and oversight of Area 40 in order to meet their redevelopment plans. The City of Folsom also asked that USEPA consider evaluating Area 40 as a stand-alone site in order to fast track remedy selection and implementation.

Prior to this latest version of the PPMR, Area 40 was part of the Aerojet Island OU (OU7). OU7 consists of several geographically isolated, highly contaminated source areas within the Aerojet Superfund site. OU7 is tracking for cleanup slower than Area 40 would on its own, due to technical complexity and baseline ecological risk assessment requirements. The current schedule for OU7 has Remedial Design (RD) and Remedial Action (RA) beginning after 2023, which would not meet the City of Folsom's current redevelopment schedule. In order to facilitate the City of Folsom's development plans, this PPRM establishes Area 40 as OU 10. USEPA has already designated it as such in its tracking system.

With the establishment of OU 10, the following approach to expedite regulatory reviews and oversight of OU 10 will be implemented:

- Following the finalization of the Feasibility Study for Area 40, USEPA will establish an agreement with the State of California (State) giving the State lead regulatory authority for the Superfund process of OU 10
 - The State will prepare a Remedial Action Plan (RAP), which will include a Proposed Plan that meets USEPA's requirements and a California Environmental Quality Act (CEQA) document that meets the State's requirements. USEPA will review, comment as necessary, and provide concurrence with the State RAP.
 - USEPA will prepare a streamlined ROD requiring the implementation of the remedy in the RAP to complete its CERCLA obligations.
- Additionally, the following text was added to Section 3.2 and the number of source areas in the IOU was updated to 68

In order to facilitate the City of Folsom's development plans, Area 40 is being removed from Island OU and the Area 40 OU (OU 10) is being established. The number of source areas in Island OU has been adjusted to reflect this change (5 source areas moved from Island OU to Area 40 OU).

Area 40 OU – This OU contains potential source areas (5) located on the far eastern portion of Aerojet's Superfund property to the east of Prairie City Road. The five source areas were used to safely separate ammonium perchlorate contaminated with TCE and burn the ammonium perchlorate on the ground surface. This area is currently open space and is slated to be developed by the City of Folsom primarily into open space, a recreational park with some peripheral commercial and residential areas. The review and development of cleanup decision documents is being expedited to meet the City of Folsom's development plans. See text at the end of Section 3.3, below.

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From: Fennessy, Christopher
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To: Keller, Lynn (Keller.Lynn@epa.gov); rojas-mickelson.daewon@epa.gov; jim.rohrer@dtsc.ca.gov; MacNicholl, Peter@DTSC (Peter.MacNicholl@dtsc.ca.gov) (Peter.MacNicholl@dtsc.ca.gov); MacDonald, Alex@Waterboards (Alex.MacDonald@waterboards.ca.gov)
Cc: Kvam, Peter
Subject: Draft 2017 PPMR Update

Hi Everyone – Please review the attached draft update to the Program Plan Modification Report and provide your comments by December 1, 2017. The final version is due by December 22, 2017.

The updates to this document include the following:

- Language was added to document the plan for Area 40. This language was extracted from a letter sent by AR to EPA. Please edit as necessary to document the plan for management of Area 40.
- The schedule for Area 40 was added to Table 5
- The schedules we discussed during the September 2017 technical meeting have been incorporated into Table 5.

- I anticipate the FCS LUC will be finalized before this document is finalized on December 22, 2017, so I have updated the status column for that site in Table 2.

Thanks, Chris

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